

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

PURDUE PHARMA L.P., *et al.*,

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

**NOTICE OF HEARING ON MOTION FOR LEAVE TO FILE AMENDED PROPOSED
ORDER BY DOW JONES & COMPANY, INC., BOSTON GLOBE MEDIA
PARTNERS, LLC, AND REUTERS NEWS & MEDIA, INC.**

PLEASE TAKE NOTICE that, upon the annexed Motion dated November 30, 2020, Dow Jones & Company, Inc., Boston Globe Media Partners, LLC, and Reuters News & Media, Inc., by their undersigned counsel, will move before the Honorable Robert D. Drain, United States Bankruptcy Judge, in the United States Bankruptcy Court of the Southern District of New York (the “Bankruptcy Court”), 300 Quarropas Street, White Plains, New York 10601, on December 15, 2020, at 10:00 a.m. (prevailing Eastern Time), or as soon thereafter as counsel may be heard, for an Order permitting them to file an amended proposed order in conjunction with their previously-filed motion to intervene for the limited purpose of seeking public access to sealed and redacted documents filed with the Court in these proceedings.

PLEASE TAKE FURTHER NOTICE that pursuant to General Order M-543, dated March 20, 2020 (Morris, C.J.), such hearing shall be conducted telephonically so long as General Order M-543 is in effect on the day of the hearing or unless otherwise ordered by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that any hearing conducted by telephone shall be conducted pursuant to Judge Drain’s guidelines for telephonic appearances and may require

registration with Court Solutions LLC. Judge Drain's guidelines may be found at <http://www.nysb.uscourts.gov/content/judge-drains-chambers-rules>. You may reach Court Solutions by telephone at (917) 746-7476 or online at www.court-solutions.com. You need not appear at the hearing if you do not object to the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE that the Motion was electronically filed with the Bankruptcy Court. Copies of the Motion cases may be obtained free of charge by visiting the website of Prime Clerk at <https://restructuring.primeclerk.com/purduepharma>.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M-399, and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures entered on November 18, 2019 [ECF 498], so as to be actually received no later than December 12, 2020, at 4:00 p.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and a failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates in open court at the Hearing.

Date: November 30, 2020

Respectfully submitted,

/s/ Katie Townsend

Katie Townsend

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COMPANY, INC., BOSTON GLOBE MEDIA PARTNERS, LLC, AND
REUTERS NEWS & MEDIA, INC.**

Dow Jones & Company, Inc., publisher of *The Wall Street Journal* and other publications, including *WSJ Pro Bankruptcy* and Dow Jones Newswires, Boston Globe Media Partners, LLC, publisher of *The Boston Globe* and *STAT*, and Reuters News & Media, Inc. (collectively, the “Media Intervenors”), hereby move for leave to file an amended proposed order in conjunction with their previously-filed Motion to Intervene and Unseal Judicial Records, ECF 2022 (“Unsealing Mot.”).

The Media Intervenors seek to unseal *all* sealed and redacted judicial documents filed with the Court in these proceedings. Unsealing Mot. at 1. However, the Media Intervenors inadvertently omitted one group of exhibits from the list of documents to be unsealed and placed on the public docket in the Proposed Order included with their Motion, ECF 2022-1—the sealed exhibits attached to the Declaration of Arik Preis dated November 18, 2020, ECF 2015 (“Preis Declaration”). Exhibits A–B, 110–81, 183–88a, 189–99, 203–16, and 218–28 to the Preis Declaration are sealed.

Accordingly, the Media Intervenors seek leave of the Court to file an amended proposed order, attached hereto as Exhibit B, that includes the sealed exhibits to the Preis Declaration in the list of documents to be unsealed and placed on the public docket.

Date: November 30, 2020

Respectfully submitted,

/s/ Katie Townsend

Katie Townsend

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